

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLIES
IN EXCESS OF FIFTEEN PAGES**

Pursuant to Local Rule 7.1(D), Curling Plaintiffs respectfully request leave for both Plaintiff groups to file additional pages—not to exceed forty (40) pages each—for their Replies in Support of their Motions for Attorneys' Fees Under 42 U.S.C. § 1988 (Dkt. Nos. 595, 596).

State Defendants filed a forty-five (45) page Consolidated Response in Opposition to Plaintiffs' Motions for Attorneys' Fees and Costs (Dkt. No. 660). Fulton County Defendants filed a thirty-one (31) page Consolidated Response to Plaintiffs' Motions for Attorneys' Fees (Dkt No. 661). There are seventy-six (76) total pages of objections and only a small portion does not have potential application to both groups of Plaintiffs. Defendants raised numerous issues with

Plaintiffs' voluminous time records, objecting to dozens of specific entries as well as casting aspersions on Plaintiffs' timekeeping ability and ethics in general.

Thus, Replies in excess of the fifteen (15) pages provided by Local Rule 7.1(D) are necessary in order to properly and fully respond to Defendants' objections and correct Defendants' misleading portrayal of the issues. A proposed order granting leave for both Plaintiff groups to file additional pages is attached.

Dated: January 15, 2020

Respectfully submitted,

/s/ David D. Cross
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross

David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2020 a copy of the foregoing **CURLING PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN EXCESS OF FIFTEEN PAGES** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross